

All Star Media, Inc.

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MAIL BRANCH

The Honorable Donna R. Searcy
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RE: Limitations on Commercial Time on Television Broadcast Stations, MM
Docket No. 93-254

Dear Ms. Searcy:

I am writing to express my opposition to the suggestion in the Commission's Notice of Inquiry that time limitations be reimposed on the amount of commercial matter broadcast by television stations.

I am the President of All Star Media, which provides media buying services for infomercial (30 minute) clients. I have worked in this industry since 1984, and was a member of the first company to place an infomercial on the air. My primary role in this industry has been TV media buying, and I have seen and purchased for every product category and almost every successful infomercial up to 1989. Over the last ten years, I have purchased media time on every national cable, regional cable, and local broadcast station. Infomercials have grown from less than 1% to 6% of the annual revenues of all local broadcast stations in the U.S. Personally, I have placed over \$100,000,000 in media, and that is only a portion of the dollars spent by the three companies I have been associated with for the past ten years.

The importance of these media dollar figures is that none of this money would have been spent, and not one minute of airtime would have been purchased, if the TV viewers were not buying the products. One unchangeable fact about direct response TV is that we can measure to the person, the popularity of the TV infomercial offer. It is because of the viewers that these programs can continue to air on TV. If the viewers did not buy the products, and if the popularity of the infomercials was low, then there would not be enough revenue generated to continue airing the shows and paying for the media time.

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"Television For Profit"

The number of cable and broadcast TV stations has expanded and still it is not enough to meet the media demand for infomercials. We could easily go from 6% to 20% of broadcast and station revenues, if the stations would allow more programming time for 30-minute programs. I do not understand why the government would want to impose limitations on an expanding market that TV viewers and consumers directly and actively support. Direct response TV is an expanding market that is already limited by the TV stations themselves, and a market that will explode once we utilize interactive TV.

The infomercial formats are changing dramatically, and I believe we will see products and services sold that are integrated in regular programming with interactive TV. This will be a way for advertisers to earn revenue and TV stations may partner with them. With 500 viewing options, how will broadcast and cable stations generate enough dollars to stay in business? I think that limiting commercial time will choke off a vital financial option of the future.

I have attempted to estimate the amount of media dollars the three companies I have worked with have paid to TV stations in the past ten years. A close estimate would be \$200,000,000, and as I stated before, we could have bought a great deal more if the stations would have allowed it.

The final statement I would like to make is that infomercials offer the consumer an entertaining, informative, and reasonably priced option to retail and catalog shopping. Yes, the infomercial is designed to sell; however, the format offers the consumer information and understanding of how and why a product works. Demonstrations are given of how the product is used, as well as opinions from customers on the product's effectiveness. The products are offered at lower than retail prices, because the manufacturer sells directly to the consumer.

How often have you been able to have a half-hour demonstration of a product you were considering buying in a retail store? I think the infomercial format is so popular with consumers because it addresses their need for an informed buying decision, with the safety of a money-back guarantee if they are not satisfied with the product.

I really do not understand who the F.C.C. is attempting to protect in this consideration. A public that is informed and therefore able to make rational commercial choices would be in the interest of the F.C.C. Isn't the restriction of commercial time a First Amendment consideration? Thank you for your consideration of my opposition. There are many people employed in this rapidly growing industry that will be grateful for the continuing growth and success of the Direct Response TV arena.

Sincerely,

A handwritten signature in cursive script, appearing to read "Caswell Forrest".

Caswell Forrest
President and C.E.O., All Star Media, Inc.